



**Department of Energy**  
Southeastern Power Administration  
1166 Athens Tech Road  
Elberton, Georgia 30635-6711

January 10, 2007

Mobile District, USACE  
ATTN: Joanne Brandt  
NEPA Compliance Manager  
Inland Environmental Team  
P.O. Box 2288  
Mobile, AL 36628-0001

Dear Ms. Brandt:

Southeastern Power Administration (Southeastern) would like to take this opportunity to provide comments on the Mobile District's low flow regime concept which is being developed in accordance with provisions of the U.S. Fish and Wildlife Service's Biological Opinion on the District's Interim Operations Plan (IOP) for the Jim Woodruff Project.

Southeastern reiterates the comments and concerns that we have previously expressed regarding the IOP. The plan fundamentally alters basin operation in a manner which is not conducive to the production of a dependable hydropower resource. Operating according to the plan's flow regimes will impact project storage during the critical springtime filling months and could result in lower upstream summer pool elevations as well as reductions in the quantity of generation available during the high electrical demand summer period. Lower upstream elevations and reductions in generation could occur irrespective of the system's actual hydrological drought status. In addition, when compared to the 1989 Water Control Manual, the plan imposes a reduction in the hours-use by zone which is not representative of the hydropower requirement. These altered river operations to accommodate the listed species could have significant negative impacts to Southeastern both in terms of contractual deficiencies and replacement energy purchases.

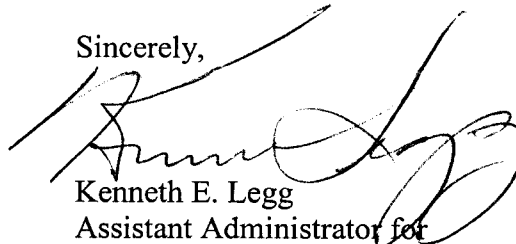
Low flow conditions are the most critical of all conditions encountered on a river system for the hydropower purpose. The suggested modifications to the IOP of increasing releases during low flow periods will result in a more rapid depletion of system storage. During these periods, the preservation of storage is typically the objective of river basin operation. In recent drought events there has been a close spirit of cooperation among the District, Southeastern, and the customers (Drought Busters) in developing strategies to preserve the water resource in the river basin at the onset of a drought, while continuing to maximize hydropower benefits. These actions have been taken at a considerable expense to the customers. Increasing the discharges during periods of low inflows would conflict with this

strategy by utilizing the resource which has been preserved and undermining the positive effects to the river basin that have been achieved as a result of the customers' expenditures. Without the expectation of future benefits resulting from their expenditures, the customers could cease their cooperative efforts.

Southeastern hopes that the District will continue its efforts in the development and refinement of a river basin plan which will satisfy the District's endangered species obligations while minimizing impacts to authorized project purposes. In addition, Southeastern would welcome an analysis by the District, which determines the impacts of operating under the IOP on authorized project purposes and explores methods of compensating purposes for lost benefits.

Southeastern appreciates the Mobile District's efforts on this issue and looks forward to continuing to work with the District on this and other important basin issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth E. Legg", is written over the typed name and title.

Kenneth E. Legg  
Assistant Administrator for  
Power Resources